

23. As a direct and proximate result of said disparate treatment, plaintiff has suffered a substantial loss of compensation, loss of opportunity and a loss of reputation. Further, plaintiff has suffered humiliation, embarrassment, loss of self esteem, adverse working conditions, harassment and loss of time and money endeavoring to protect herself from defendant City of Cincinnati's unlawful discrimination, including costs and attorneys fees.

#### **V. COUNT II**

24. Plaintiff realleges herein all the allegations set forth in paragraphs 1 through 23 of this Complaint as if fully rewritten herein.

25. At all times relevant, defendant Board and its officers, employees and agents treated plaintiff disparately on the basis of her race, national origin and gender in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000e, et seq., and the Fourth and Fourteenth Amendments to the United States Constitution.

26. As a direct and proximate result of said disparate treatment, plaintiff suffered a substantial loss of compensation, loss of opportunity and a loss of reputation. Further, plaintiff has suffered humiliation, embarrassment, loss of self-esteem, adverse working conditions, harassment and loss of time and money endeavoring to protect herself from defendant Board's unlawful discrimination, including costs and attorney fees.

#### **VI. COUNT III**

27. Plaintiff restates herein all the allegations set forth in paragraphs 1 through 26 of this Complaint as if fully rewritten herein.

28. Defendant City's discriminatory treatment of plaintiff because of her race, national origin and gender violates Ohio Revised Code Section 4112.02 and 4112.99.

29. As a result of defendant City of Cincinnati's discriminatory conduct, plaintiff has been damaged as set forth in more detail in this Complaint.

#### **VII. COUNT IV**

30. Plaintiff realleges herein all the allegations set forth in paragraphs 1 through 29 of this Complaint as if fully rewritten herein.

31. Defendant Board's discriminatory treatment of plaintiff because of her race, national origin, and gender violates Ohio Revised Code Sections 4112.02 and 4112.99.

32. As a result of defendant Board's discriminatory conduct, plaintiff has been damaged as set forth in more detail in this Complaint.

### **VIII. COUNT V**

33. Plaintiff realleges herein all the allegations set forth in paragraphs 1 through 32 of this Complaint as if fully rewritten herein.

34. Defendant City's discriminatory treatment of plaintiff because of her age violates the ADEA, 29 U.S.C. 623 and Ohio Rev. Code section 4112.02 and 4112.14.

35. As a result of defendant City's discriminatory conduct, plaintiff has been damaged as set forth in more detail in this Complaint.

### **IX. COUNT VI**

36. Plaintiff realleges herein all the allegations set forth in paragraphs 1 through 35 of this Complaint as if fully rewritten herein.

37. Defendant Board's discriminatory treatment of plaintiff because of her age violates the ADEA, 29 U.S.C., 623 and Ohio Rev. Code sections 4112.02 and 4112.14.

38. As a result of Defendant Board's discriminatory conduct, plaintiff has been damaged as set forth in more detail in this Complaint.

### **X. COUNT VII**

39. Plaintiff realleges herein all the allegations set forth in paragraphs 1 through 38 of this Complaint as if fully rewritten herein.

40. The defendant City retaliated against plaintiff for pursuing her rights under federal and state law.

41. As a result of defendant City's discriminatory conduct, plaintiff has been damaged as set forth in more detail in this Complaint.

### **XI. COUNT VIII**

42. Plaintiff realleges herein all the allegations set forth in paragraphs 1 through 41 of this Complaint as if fully rewritten herein.

43. The defendant Board retaliated against plaintiff for pursuing her rights under federal and state law.

44. As a result of defendant Board's discriminatory conduct, plaintiff has been damaged as set forth in more detail in this Complaint.

## **XII. COUNT IX**

45. Plaintiff realleges herein all the allegations set forth in paragraphs 1 through 44 of this Complaint as if fully rewritten herein.

46. The conduct of defendant City, by and through its agents, alleged hereinabove, constitutes an intentional, knowing and reckless infliction of emotional harm.

47. As a direct and proximate result of said intentional conduct, plaintiff has suffered and will continue to suffer damages, including, but not limited to, anxiety, stress and emotional trauma in an amount to be more fully determined at trial.

## **XIII. COUNT X**

48. Plaintiff realleges herein all the allegations set forth in paragraphs 1 through 47 of this Complaint as if fully rewritten herein.

49. The conduct of the defendant Board, by and through its agents, alleged hereinabove, constitutes an intentional, knowing and reckless infliction of emotional harm.

50. As a direct and proximate result of said intentional conduct, plaintiff has suffered and will continue to suffer damages, including, but not limited to, anxiety, stress and emotional trauma in an amount to be more fully determined at trial.

## **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff respectfully requests this Court to :

- (a) Enter a judgment finding that defendants City of Cincinnati and Board has violated federal and Ohio law as set forth above;
- (b) Award damages that will reasonably compensate plaintiff for her damages, including loss of employment opportunities and accompanying health care benefits as set forth above;
- (c) Award plaintiff an amount to be determined at trial for humiliation, embarrassment, loss of reputation, loss of self-esteem, emotional distress and pain and suffering;
- (d) Award plaintiff punitive damages in the amount of \$ 100,000.00;
- (e) Award plaintiff reasonable attorney fees and costs of this action; and
- (f) Grant plaintiff such other and further relief as may be just and equitable.

Respectfully submitted,

/s/ David E. Hardin

David E. Hardin (0066415)

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**DEMAND FOR TRIAL BY JURY**

Pursuant to the Federal Rules of Civil Procedure, plaintiff hereby demands a jury trial on all issues so triable.

/s/ David E. Hardin

David E. Hardin (0066415)